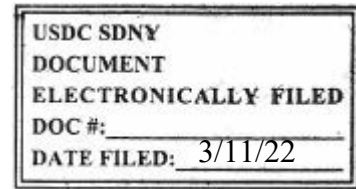




March 10, 2022



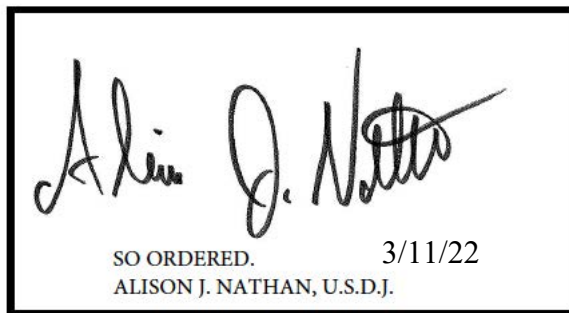
**VIA ECF**

Judge Alison J. Nathan  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**RE: *Western Waterproofing Company d/b/a Western Specialty Contractors v. Zurich American Insurance Company et al.*, Civil Action No.: 1:20-cv-3199-AJN; Related Action: 1:19-cv-6386-AJN**

Dear Judge Nathan:

Pursuant to Your Honor's Individual Rules of Practice, and in light of Your Honor's Orders dated February 18, 2022 (Doc. 224) and February 24, 2022 (Doc. 229), granting two-week extensions of time for all parties to respond to Plaintiff, Western Waterproofing Company, Inc. d/b/a Western Specialty Contractors' ("Western"), Motion to Certify the February 3, 2022 Opinion & Order and Motion for Reconsideration, respectively, Western respectfully requests a two-week extension of time to respond to any oppositions filed against each motion. Specifically, Western seeks an extension from March 21, 2022 to April 4, 2022 to file replies to any oppositions to its Motion to Certify the February 3, 2022 Opinion & Order for Interlocutory Appeal. Similarly, Western seeks an extension from March 19, 2022 to April 4, 2022 to file replies to any oppositions to its Motion for Reconsideration. All parties have consented to both of Western's extension requests.



Respectfully submitted,

/s/ Melanie A. McDonald  
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cc: All Parties (via ECF)